IN THE UNITED STATES BANKRUPTCY COURT FOR EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Henry Bedford

aka Andrei Losev

dba Hot Rod Motors and Lars Group, Inc.

Debtor

Shellpoint Mortgage Servicing as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely

As Owner Trustee For VRMTG Asset Trust

Trust

v.

Henry Bedford

aka Andrei Losev dba Hot Rod Motors and Lars Group,Inc.

Debtor

KENNETH E. WEST

Responde OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Shellpoint Mortgage Servicing as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO LLP

Attorneys for Shellpoint Mortgage Servicing as Servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 Bankruptcy@FriedmanVartolo.com

CASE NO.: 19-16254-amc

Judge: Ashely M. Chan

CHAPTER 13

Hearing Date:

Objection Deadline:

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its

Case 19-16254-amc Doc 88 Filed 06/17/24 Entered 06/17/24 11:58:31 Desc Main

Page 2 of 4 Document

property or its estates. The persons listed above request that their names and addresses be added

to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and

Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit

shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after

de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this

case or any case, controversy, or proceeding related to this case, (iii) the right to have the District

Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv)

any objection to the jurisdiction or venue of this Court for any purpose other than with respect to

this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment,

in law or in equity, under any agreement, all of which are expressly waived.

Dated: June 17, 2024

By: /s/ Lauren Moyer

Lauren Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Shellpoint Mortgage Servicing

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Garden City, NY 11530

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IN THE UNITED STATES BANKRUPTCY COURT FOR EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Henry Bedford

aka Andrei Losev

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Debtor

Shellpoint Mortgage Servicing as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset

Trust

v.

KENNETH E. WEST - Bankruptcy

Trustee

Respondents

CASE NO.: 19-16254-amc

CHAPTER 13

Judge: Ashely M. Chan

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CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 17, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON:

By: <u>/s/ Lauren Moyer</u> Lauren Moyer, Esq.

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Service by Regular Mail

Henry Bedford aka Andrei Losev dba Hot Rod Motors and Lars Group,Inc. 66 Carmelita Dr Richboro, PA 18954 *Bankruptcy Debtor*

Service by NEF

KENNETH E. WEST 1234 Market Street - Suite 1813 Philadelphia, PA 19107 *Bankruptcy Trustee*

Michael I. Assad 1500 Walnut St, Ste 900 Philadelphia, PA 19102 **Debtor Attorney**

United States Trustee Robert N.C. Nix Federal Building Suite 320 Philadelphia, PA 19107 *United States Trustee*